

# **EXHIBIT A**

**From:** Tomezsko, Sara B.  
**Sent:** Thursday, October 5, 2023 9:41 PM  
**To:** Gelfand, Shira Z.; Dabashi, Kaveh; Gage, Kenneth W.; Gutierrez, Jean Marie  
**Cc:** Greene, Cara; Chiarello, Gregory; Robinson, Abigail L.; Yang, Vincent  
**Subject:** RE: Google/Rowe - Outstanding Items

Hi Shira – Some responses below in **bold**.

**PAUL  
HASTINGS**

**Sara Tomezsko | Partner, Employment Law Department**

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**From:** Gelfand, Shira Z. <sgelfand@outtengolden.com>  
**Sent:** Thursday, October 5, 2023 9:17 PM  
**To:** Dabashi, Kaveh <kavehdabashi@paulhastings.com>; Tomezsko, Sara B. <saratomezsko@paulhastings.com>; Gage, Kenneth W. <kennethgage@paulhastings.com>; Gutierrez, Jean Marie <jeanmariegutierrez@paulhastings.com>  
**Cc:** Greene, Cara <ceg@outtengolden.com>; Chiarello, Gregory <gchiarello@outtengolden.com>; Robinson, Abigail L. <ARobinson@outtengolden.com>; Yang, Vincent <vyang@outtengolden.com>  
**Subject:** [EXT] RE: Google/Rowe - Outstanding Items

--- External Email ---

Hi Kaveh,

We accepted your edits and added just one more thing in redline. Additionally, we are attaching Appendix A (the version you sent earlier this evening) with some edits:

1. We added P152 (GOOG-ROWE-00066522-66584) to our exhibit list after Ms. Florissi testified as to Jen Bennett's hire and we realized her gHire packet was not with the others. We will send over an exhibit-stamped copy tomorrow. **I don't see how Ms. Florissi's testimony about Jen Bennett could have prompted you to add Ms. Bennett's hiring packet to your exhibit list at this late stage, given that Ms. Florissi was not working at Google when Ms. Bennett was hired, or involved in any decisions regarding Ms. Bennett's hiring or leveling. The fact that Ms. Florissi testified about Ms. Bennett in response to Cara's questions does not make Ms. Bennett's hiring packet (or decisions about her) relevant to Ms. Rowe's claims.**

I'll assume, then, that you are no longer taking the position that "evidence of Google's consideration and leveling of other OCTO Technical Directors ... has no bearing on Plaintiff's leveling; Google did not consider other leveling decisions and the reasons for them when leveling Plaintiff," and will withdraw your objections to similar hiring packets at D43 and D44. Please confirm.

2. We split up P104 into P104a, P104b, and P104c and removed some documents contained within the original exhibit. We maintained your objections as to the sub-documents but of course double check. **Yes, we will double check.**
3. It looks like you removed the \*\* from P151. If you are objecting, can you please add the basis? Otherwise if that was an error, we can add it back in. **No objections to that document, you can add the \*\* back in.**

Please edit and send back if you'd like any additional objections noted. If all looks good, we'll file in the AM. **Yup, we'll definitely be adding objections. We'll have to get back to you tomorrow on that.**

Shira



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